

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF ALABAMA

IN RE: ) CHAPTER 13  
WILLIE CHESSON )  
Debtor(s). ) CASE NO. 15-32538-DHW-13  
)

OBJECTION TO CONFIRMATION

Now comes GUARDIAN CREDIT UNION, by its attorneys, Chambless Math ❖ Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof states as follows:

1. The debtor has failed to provide evidence of insurance coverage as required 11 U.S.C. Section 1326(a)(4) on the collateral securing the loans of the movant, to wit: 2004 NISSAN TITAN.

2. The collateral securing the debts of the creditor is grossly undervalued and/or the specified monthly payment is insufficient to provide this creditor with adequate protection against depreciation of its interest over the term of the plan. The plan indicates that numerous repairs are needed to the collateral. Counsel for the creditor has twice requested estimates for repairs but has not been provided same.

WHEREFORE, GUARDIAN CREDIT UNION, prays for an Order denying confirmation along with such further relief as the Court may deem proper.

GUARDIAN CREDIT UNION

By: /s/ Leonard N. Math

Of Counsel:  
Chambless Math ❖ Carr, P.C.  
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this November 24, 2015.

Curtis C. Reding  
Chapter 13 Trustee  
P.O. Box 173  
Montgomery AL 36101

JOSHUA C. MILAM  
566 S. PERRY STREET  
MONTGOMERY AL 36104

WILLIE CHESSON  
117 STUART ST  
MONTGOMERY AL 36105

/s/ Leonard N. Math